

SZAFERMAN LAKIND

Szaferman, Lakind, Blumstein & Blader, P.C.
Attorneys at Law

101 Grovers Mill Road, Suite 200
Lawrenceville, NJ 08648
p: 609.275.0400
f: 609.275.4511
www.szaferman.com

Arnold C. Lakind
Barry D. Szaferman
Jeffrey P. Blumstein
Steven Blader
Brian G. Paul+
Craig J. Hubert++
Michael R. Paglione*
Lionel J. Frank**
Jeffrey K. Epstein+
Stuart A. Tucker
Scott P. Borsack***
Daniel S. Sweetser*
Robert E. Lytle
Janine G. Bauer***
Daniel J. Graziano Jr.
Nathan M. Edelstein**
Bruce M. Sattin***
Gregg E. Jaclin**
Robert P. Panzer
Benjamin T. Branche* Eric
M. Stein**
Of Counsel
Stephen Skillman
Linda R. Feinberg
Anthony J. Parrillo
Paul T. Koenig, Jr.
Robert A. Gladstone
Janine Danks Fox*
Richard A. Catalina Jr.*†
E. Elizabeth Sweetser
Robert G. Stevens Jr.**
Michael D. Brottman**
Lindsey Moskowitz Medvin**
Mark A. Fisher
Robert L. Lakind***
Thomas J. Manzo**
Melissa A. Chimbangu
Bella Zaslavsky**
Kathleen O'Brien
Steven A. Lipstein**
Yarona Y. Liang#
Brian A. Heyesey
Justin R. Calta
Mengyi "Jason" Ye
John O'Leary***

January 16, 2015

The Honorable Cathy L. Waldor
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

+Certified Matrimonial Attorney
++Certified Civil and Criminal Trial Attorney
*NJ & PA Bars
**NJ & NY Bars
***NJ, NY & PA Bars
#NY Bar
†U.S. Patent & Trademark Office

Re: *Redus v. New York Life Inv. Mgmt., LLC*, 2:14-cv-7991

Dear Judge Waldor:

Defendant New York Life Investment Management, LLC ("Defendant") has requested an extension of its time to answer, move, or otherwise respond to the Complaint filed by Plaintiffs. Plaintiffs have consented to Defendant's request. The parties also have agreed upon a proposed briefing schedule in the event Defendant files a motion in response to the Complaint.

A Joint Stipulation and [Proposed] Order giving effect to the parties' agreements is enclosed for Your Honor's consideration.

Defense counsel is in the process of seeking local counsel, and have informed Plaintiffs they will promptly file their *Pro Hac Vice* applications once local counsel is retained. Plaintiffs will not oppose those applications.

The parties are happy to discuss any questions the Court may have. We appreciate Your Honor's consideration.

Respectfully submitted,

/s/ Robert Lakind

Robert Lakind

cc: Jamie Fleckner (via email)